

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : CHAPTER 13  
Dennis McDonough, Jr. :  
Elizabeth McDonough : BANKRUPTCY NO.: 17-10850-elf  
Debtors :

**REPLY TO THE MOTION FOR RELIEF  
OF SCOTT CONSUMER DISCOUNT COMPANY**

Debtors, by their attorney, Brandon Perloff, Esq. by way of Reply to Movant's motion, respectfully represents the following:

1. Admitted.
2. Admitted
3. Admitted.
4. Admitted
5. Admitted.
6. Debtors intend to cure any amounts which may be due at this time.
7. Denied. The Debtors do not have the requisite knowledge to attest to the veracity of this allegation.
8. Denied. By way of further response, the Debtors intend to cure any amounts which may be due at this time.
9. Denied. The allegations contained in this paragraph constitute legal conclusions to which no response is required.
10. Denied. The allegations contained in this paragraph constitute legal conclusions to which no response is required.

WHEREFORE, Debtors pray that the Movant's request for relief be denied.

Respectfully submitted,

Date: 6/20/17

/s/ Brandon Perloff  
Brandon Perloff, Esquire.  
Attorney for Debtor